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7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 DADRIE A. MATTHIS,

11 Plaintiff,

12 vs.

13 SAFEWAY INC.,

14 Defendant.

No. 2:22-cv-00065

NOTICE OF REMOVAL TO  
FEDERAL COURT

15  
16 Please take notice that Defendant Safeway Inc. hereby removes to the United  
17 States District Court for the Western District of Washington the action described below.  
18 On November 10, 2021, Defendant Safeway Inc. was served with a summons  
19 (**Attachment 1**) and complaint (**Attachment 2**) in an action entitled *Dadrie A. Matthis v.*  
20 *Safeway, Inc.*, King County Superior Court No. 21-2-14213-0 KNT. The first date upon  
21 which Safeway Inc. received a copy of this complaint was November 10, 2021.

22 The complaint does not specify the amount of damages being claimed by the  
23 Plaintiff. On November 15, 2021, Safeway propounded a request for a statement of  
24 damages which asked Plaintiff to disclose the damages Plaintiff is claiming in this matter,  
25 as well as interrogatories and requests for production seeking information about the

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(206) 659-0679

injuries and damages Plaintiff is claiming. On December 27, 2021, Plaintiff's counsel provided information in answer to Safeway's interrogatories which make evident that Plaintiff is claiming damages in excess of \$75,000, including that Plaintiff claims severe and permanent injuries including a head injury with concussion, headaches, blurred vision and slow speech, physical injuries resulting in chronic pain syndrome, bilateral carpal tunnel syndrome, moderate to severe depression, persistence of all of these conditions more than three years after her date of injury, and past medical expenses of at least \$49,342.93. In addition, Plaintiff's complaint alleges permanent disability, income loss, need for future medical treatment/expense and general damages in amounts yet to be identified by Plaintiff.

There is complete diversity because the Plaintiff is a citizen of the State of Washington and Defendant Safeway Inc. is a corporation organized under the laws to the State of Delaware with its principle place of business in the State of California.

This court has original jurisdiction over this action pursuant to 28 U.S.C. §1332(a) because it is between citizens of different states and the amount in controversy exceeds \$75,000. This claim is removable to federal court by the defendant pursuant to 28 U.S.C. §1441 based on diversity jurisdiction.

#### INTRADISTRICT ASSIGNMENT

The case is currently pending in King County so LCR 3(e) indicates it will be initially assigned to a Seattle Judge.

A civil case cover sheet is attached as **Attachment 3**.

Dated: January 24, 2022.

TURNER KUGLER LAW, PLLC

By: s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Raymond A. Connell  
Connell Law Office, LLC  
6333 Seward Park Ave. S.  
Seattle, WA 98118  
(206) 583-0050  
[Raymond@connelllawoffice.com](mailto:Raymond@connelllawoffice.com)

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

none

s/ John T. Kugler  
JOHN T. KUGLER, WSB #19960  
Attorney for Defendant KCHA  
TURNER KUGLER LAW, PLLC  
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